UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 3:10-CR-124
)	Judges Jordan/Shirley
LESLIE JANOUS,)	
)	
Defendant.)	

BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through William C. Killian, United States Attorney for the Eastern District of Tennessee, and Frank M. Dale, Jr., Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The Indictment filed on October 5, 2010 and Amended Indictment filed on October 18, 2010, seeks forfeiture of property pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that the United States is seeking forfeiture of the following property, in addition to and supplementing the property already listed in the forfeiture allegation:

I. Real Property

A. Real Property known as **1308 Selby Lane, Knoxville, Tennessee**, **37922** and **1525 Wembley Hill Road, Knoxville, Tennessee 37922**, with all appurtenances, improvements, and attachments thereon, and more fully described as:

TRACT ONE:

SITUATED in the 6th Civil District of Knox County, Tennessee, and without the corporate limits of the City of Knoxville, Tennessee, and being known and designated as Lot 47 of Sherwood of Whittington Creek, as shown on the plat of record in Plat Cabinet P, Slide 208-B in the Register's Office for Knox County,

Tennessee, to which plat specific reference is hereby made for a more particular description, and according to the survey of James H. Loveday, Surveyor, dated July 23, 2002, Job #02186.

TRACT TWO:

SITUATED in the 6th Civil District of Knox County, Tennessee, and without the corporate limits of the City of Knoxville, Tennessee, and being known and designated as Lot 46 of Sherwood of Whittington Creek, as shown on the plat of record in Plat Cabinet P, Slide 208-B in the Register's Office for Knox County, Tennessee, to which plat specific reference is hereby made for a more particular description, and according to the survey of James H. Loveday, Surveyor, dated July 23, 2002, Job #02186.

For reference see Quit Claim Deed dated September 20, 2010 and of record as Instrument #201009200017600 in the Register's Office for Knox County, Tennessee conveying property from Leslie Janous and Leigh Derrick Janous to Leigh Derrick Janous.

For further reference see Warranty Deed dated April 10, 2010 and of record as Instrument #201004120064337 in the Register's Office for Knox County, Tennessee conveying property from Robert N. Page and wife Diane R. Page, to Leslie Janous and Leigh Derrick Janous.

B. Real Property known as **12944 Peach View Drive, Knoxville, Tennessee, 37922**, with all appurtenances, improvements, and attachments thereon, and more fully described as:

Situated in District No. Six (6) of Knox County, Tennessee, without the corporate limits of the City of Knoxville, Tennessee, being known and designated as Lot 60, Amberwood Subdivision, as shown on the plat of the same of record bearing Instrument No. 200211080041184 in the Register's Office for Knox County, Tennessee, to which plat specific reference is hereby made for a more particular description and according to the survey of Hinds Surveying Company, Stanley E. Hinds, Surveyor, dated August 10, 2004, bearing Job No. 0408009.

For reference see Warranty Deed dated December 9, 2004 and of record as Instrument #200412130047950 in the Register's Office for Knox County, Tennessee conveying property from Marcee Fischer Townsend and husband, Christopher Townsend, to Martha Leigh Janous and Leslie Ann Gibbs.

C. Real Property known as **10045 South Northshore Drive, Knoxville, Tennessee, 37922**, with all appurtenances, improvements, and attachments thereon, and more fully described as:

Situated in District No. Six (6) of Knox County, Tennessee and without corporate limits and being known and designated as all of Lot 2R-1B1R, of the Final Plat of Lots 2R-1B1 and 2R-1B2 of the Resubdivision of Lot 2R-1B of Michael Dunham Property, a map of the same at Instrument No. 200810070024327, in the Register's Office for Knox County, Tennessee, to which plat specific reference is made for a more particular description.

For reference see Quit Claim Deed dated September 20, 2010 and of record as Instrument #201009200017599 in the Register's Office for Knox County, Tennessee conveying property from Leigh Derrick Janous and Leslie Anne Janous to Leigh Derrick Janous.

II. Personal Property

A. Vehicles

- 1. 2008 Silver BMW 328i Sedan, VIN WBAVA37538NL43516
- 2. 2010 Blue Audi A4 Sedan, VIN WAUFFAFL4AN032838
- 3. 2007 Yamaha VX 1052cc personal watercraft (Hull ID No. YAMA4024F707)
- 4. 2007 Yamaha VX 1052cc personal watercraft (Hull ID No. YAMA4018F707)

B. Jewelry and accessories

- 1. Scott Kay platinum diamond sapphire ring, purchased from Jared on December 4, 2004, for \$5,240.
- 2. Diamond rectangular face watch with serial number 090251408 purchased from Tiffany & Co. (New York, NY) on November 25, 2005, for \$3,350.
- 3. Two-tone gold bangle heart bracelet and matching ring, purchased from Tiffany & Co. (New York, NY) on November 25, 2005, for \$510.
- 4. Coupe Mark watches with serial numbers 010238318 and 090231960 purchased from Tiffany & Co. (New York, NY) on December 30, 2004, for \$3,300.
- 5. 14K white gold anniversary band with diamonds, purchased from Jared on March 13, 2005 for \$5,598.

- 6. 14K white gold diamond bangle bracelet, purchased from Jared on March 15, 2005, valued at \$2,499.
- 7. Unidentified jewelry item purchased from Jared on May 15, 2005, for \$6,600.
- 8. 14K white gold diamond bracelet, purchased from Jared on May 21, 2005, for \$2,499.99.
- 9. 14K white gold diamond earrings, purchased from Jared on May 21, 2005, for \$2,999.99.
- 10. 14K white gold diamond earrings, purchased from Jared on May 21, 2005, for \$2,399.99.
- 11. Diamond line bracelet, purchased from Jared on May 21, 2005, valued at \$2,499.99.
- 12. 6 3/8 carat total weight, channel set line bracelet plus added three links containing 59 p.c. diamonds, purchased from Jared on May 25, 2005, valued at \$8,876.99.
- 13. Unidentified jewelry item, purchased from Jared on May 27, 2005, for \$12,200.
- 14. 18K white gold diamond bracelet, purchased from Jared on May 28, 2005, for \$3,199.99.
- 15. 14K white gold diamond fashion band, purchased from Jared on June 11, 2005, valued at \$799.99.
- 16. 14K white gold diamond hoop earrings, purchased from Jared on June 11, 2005, for \$1,199.99.
- 17. 14K white gold diamond bracelet, purchased from Jared on June 11, 2005, for \$1,399.99.
- 18. 14K white gold oval royal blue sapphire diamond ring, purchased from Jared on August 25, 2005, for \$1,799.99.
- 19. 14K white gold fashion diamond ring, purchased from Jared on August 25, 2005, for \$3,299.99.

- 20. 14K white gold anniversary band, purchased from Jared on August 25, 2005, for \$899.99.
- 21. 14K white gold fashion diamond ring, purchased from Jared on August 25, 2005, for \$1,299.
- 22. Unidentified jewelry items purchased at Tiffany & Company (Las Vegas, Nevada) on October 23, 2008, for \$19,799.
- 23. Ladies Rolex watch, black mother of pearl with diamonds, serial number F062476, style # R791744OUB7824, purchased from Jared on October 30, 2005, for \$12,162.48.
- 24. 14K white gold fashion diamond ring, purchased from Jared on October 30, 2005, for \$4,999.99.
- 25. Sterling cuff, unspecified Peretti silver jewelry, sterling credit card case, sterling heart ring, sterling double mini open heart bangle, sterling basics ring, sterling bar pendant, sterling small open heart pendant, sterling mini open heart ring, sterling medium open heart pendant, purchased from Tiffany & Co. (New York, NY) on September 3, 2005, for \$3,970.
- 26. 18K white gold diamond and blue sapphire ring, with 8x8 mm. natural blue sapphire (p.c.), purchased from Jared on December 1, 2005, valued at \$23,000.
- 27. Platinum 2 carat total diamond weight princess cut diamond studs, purchased from Jared on December 7, 2005, valued at \$7,399.
- 28. Platinum solitaire earrings, purchased from Jared on December 7, 2005, for \$2,999.99.
- 29. 14K white gold diamond engagement ring containing three princess cut diamonds and eight baguette shape diamonds, purchased from Jared on December 10, 2005 and February 2, 2007, valued at \$26,000.
- 30. 2 3/4 carat total diamond weight bracelet in 14K white gold, purchased from Jared on December 16, 2005, valued at \$5,999.99.
- 31. 14K white gold custom designed ring, containing 1.50 carat p.c. center stone, purchased from Jared on December 16, 2005 and March 31, 2007, valued at \$26,500.

- 32. Four unidentified jewelry items purchased from Jared on December 16, 2005, for \$3,000, \$2,700, \$12,400, and \$475.
- 33. 14K white gold diamond neckwear, purchased from Jared on December 16, 2005, for \$1,649.
- 34. 14K white gold diamond bracelet, purchased from Jared on December 16, 2005, for \$5,999.99.
- 35. 14K white gold earrings, purchased from Jared on December 22, 2005, for \$1,799.99.
- 36. 14K white gold neckwear, purchased from Jared on December 22, 2005, for \$2,799.99.
- 37. 14K white gold 2 carat total weight diamond hoop earrings, purchased from Jared on December 22, 2005, valued at \$2,799.99.
- 38. 18K white gold anniversary band, purchased from Jared on January 31, 2006, for \$3,999.99.
- 39. 18K 18-inch white gold round diamond tennis necklace, consisting of multiple size round brilliant diamonds, purchased from Jared on February 24, 2006, valued at \$17,775.
- 40. 18K white gold bangle bracelet containing three round brilliant (Leon Artisen) cut diamonds, purchased from Jared on May 11, 2006, valued at \$4,499.
- 41. 18K white gold "LeVian" heart pendant with sapphire and diamonds, purchased from Jared on May 11, 2006, valued at \$2,850.
- 42. 14K white gold diamond and blue sapphire bracelet, purchased from Jared on December 21, 2006, for \$4,499.99.
- 43. 14K white gold 1 carat total diamond weight ring, purchased from Jared on February 9, 2007, valued at \$1,299.99.
- 44. 18K white gold 1 1/6 carat total diamond weight Gregg Ruth earrings, purchased from Jared on February 9, 2007, valued at \$2,555.
- 45. 14K white gold princess cut and round vintage style diamond ring, purchased from Jared on February 9, 2007, valued at \$1,499.99.

- 46. Mikimoto designer pearl necklace, purchased from Jared on March 24, 2007, valued at \$3,199.
- 47. 14K white gold diamond earrings, purchased from Jared on March 6, 2008, for \$1,499.99.
- 48. 18 inch 14K gold Mikimoto pearl necklace, purchased from Jared on April 10, 2008, for \$3,459.28.
- 49. Platinum and diamond solitaire ring with one 2.62 carat modified round brilliant cut diamond surrounded by round brilliant cut diamonds weighing .78 carat total weight, purchased from Tiffany & Co. (Las Vegas, Nevada) on October 23, 2008, for \$73,500.
- 50. Sterling silver pendants and bracelets, purchased from Tiffany & Co. (Las Vegas, Nevada) on December 27, 2008, for \$750.
- 51. Cashmere scarf and wrap, swing oval dark tortoise sunglasses, and sterling snowflake charm, purchased from Tiffany & Co. (Las Vegas, Nevada) on January 1, 2009, for \$1,355.
- 52. Patek Philippe watch, purchased from Wynn & Co. Jewelry (Las Vegas, Nevada) on January 1, 2009, for \$11,500.
- 53. 14K white gold diamond cuff bracelet, purchased from Jared on January 10, 2009, for \$1,250.
- 54. 14K white gold diamond earrings, purchased from Jared on January 10, 2009, for \$499.99.
- 55. 14K white gold diamond neckwear, purchased from Jared on January 10, 2009, for \$499.99.

C. Furniture and household items

- 1. Furnishings and household items purchased from O.P. Jenkins on April 2, 2010, for \$17,348.
- 2. Furnishing purchased from O.P. Jenkins on April 10, 2010, for \$3,594.
- 3. Furnishings and household items purchased from Gift and Gourmet Interiors on April 24, 2010, for \$25,000.

- 4. Furnishings and household items purchased from Gift and Gourmet Interiors on April 27, 2010, for \$25,000.
- 5. Furnishings and household items purchased from Gift and Gourmet Interiors on April 29, 2010, for \$20,000.
- 6. Furnishings and household items purchased from Gift and Gourmet Interiors on June 16, 2010, for \$8,252.45.
- 7. Furnishings and household items purchased from Gift and Gourmet Interiors on July 23, 2010, for \$1,475.

D. Artwork

1. Unspecified artwork purchased from Peter Lik Kona Kohala Coast Art Dealer & Gallery, on March 27, 2010, for \$12,300.

E. Other

- 1. Two limited edition evening clutches, purchased from Christian Dior Boutique, on November 25, 2005, for \$3,400.
- 2. Two limited edition evening clutches, purchased from Christian Dior Boutique, on November 25, 2005, for \$4,580.
- 3. 2005 Marc Jacobs satin striped handbag, purchased from Bergdorf Goodman (New York, NY) on November 25, 2005, for \$995.
- 4. Brown leather duffle-style handbag with matching wallet, purchased from Burberry (New York, NY) on November 25, 2005, for \$1,758.
- 5. Panasonic TH-65Pz75OU Plasma TV, purchased from Vanns.com on May 2, 2008, for \$6,399.87.
- 6. Unspecified Prada leather items purchased from Prada (Las Vegas, Nevada) on December 27, 2008, for \$2,380.
- 7. Unspecified Prada leather items purchased from Prada (Las Vegas, Nevada) on December 26, 2008, for \$4,375.
- 8. Unspecified Apple computer equipment purchased on March 11, 2009, for \$2,912.61.

- 9. Unspecified Apple computer equipment purchased on July 31, 2009, for \$2,017.74.
- 10. Unspecified Apple computer equipment purchased on October 15, 2009, for \$1,368.90.

F. <u>Currency</u>

- 1. Funds in the amount of \$50,488.71 in U.S. currency, seized from Bank of America account number xxxxxxxx2487.
- 2. Funds in the amount of \$49,988.00 in U.S. currency, seized from Bank of America account number xxxxxxxx8919.

Respectfully submitted,

WILLIAM C. KILLIAN United States Attorney

By: s/ Frank M. Dale, Jr. Frank M. Dale, Jr.

Assistant United States Attorney Eastern District of Tennessee 800 Market Street, Suite 211 Knoxville, Tennessee 37902 Telephone: (865) 545-4167 **CERTIFICATE OF SERVICE**

I hereby certify that on February 11, 2011, a copy of the within and foregoing Bill of

Particulars for Forfeiture of Property was filed electronically. Notice of this filing will be sent by

operation of the Court's electronic filing system to all parties indicated on the electronic filing

receipt. Parties may access this filing through the Court's electronic filing system.

s/ Frank M. Dale, Jr.

Frank M. Dale, Jr.

Assistant United States Attorney

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